

EXHIBIT G

NATIONAL COURT REPORTING

1 IN THE UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF OHIO
3 WESTERN DIVISION

COPY

4
5 CARL G. SIMPSON & BONNIE REED
6 SIMPSON, CO-ADMINISTRATORS OF THE
7 ESTATE OF CARL D. SIMPSON, et al.

8
9 Plaintiffs,

10
11 VS.

CIVIL ACTION

12 No. C-1-000014

13
14 INTERMET CORPORATION, et al.,

15
16 Defendants.

17
18 DEPOSITION OF THOMAS DERSHEM

19
20
21 STIPULATIONS

22 IT IS STIPULATED AND

23 AGREED, by and between the parties,

NATIONAL COURT REPORTING

1 1630s that were equipped with a light
2 beam or some type of light curtain
3 that would prohibit the activation of
4 a solenoid valve if there was
5 something within a pinch point? Is
6 that something you are familiar with?

7 A. No, I am not.

8 Q. Is that something that
9 could be done?

10 A. I am not a proponent of
11 light curtains.

12 Q. And why is that?

13 A. Because I have never been
14 in a facility where they have
15 properly checked a light curtain, and
16 a light curtain would not have
17 prevented anyone from manually
18 operating a valve.

19 Q. So, hydraulic solenoid
20 valves could not be equipped with a
21 light beam light curtain that would
22 prohibit the activation of that valve
23 if something were in a pinch point;